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Graded Approach to Readiness Assessment Status for the Modular Tanks Portion of the Solar Ponds Remediation Project.

R L Benedetti, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc

This letter is written in response to your letter of December 10, 1992 (92-RF-14240), on the same subject. We basically concur with the graded approach to readiness certification for the ITS diversion project as defined in the referenced letter. We also agree that, because of the Hazard Classification of the project, i.e., non-nuclear, Category III, Low Level Mixed Waste we should use a less rigorous approach to readiness certification. We do, however, need the specifics and the substance of the criteria by which EG&G will assess the readiness of the ITS diversion project before we can approve the proposed readiness process.

The referenced letter states that EG&G intends to apply the requirements of the Configuration Change Control Program (CCCP) to assess the readiness of the project The RFO Solar Ponds Remediation Program (SPRP) Team needs to become familiar with the CCCP in order to understand how it's application to the ITS diversion project will assure that the Modular Tanks System is in fact ready to accept ITS water. We need to know what the specific requirements are and how EG&G has determined that these requirements are applicable, adequate and in fact, have been applied to the ITS diversion project. EG&G should arrange a briefing for the RFO SPRP team so that they may become familiar with the CCCP and it's applicability to this project.

The referenced letter also states that the program has and is assembling "appropriate documentation" RFO needs to review the listing of "appropriate documentation" and concur with it's adequacy RFO would also review and concur with the key project elements that EG&G is independently self assessing

The boundaries of the readiness assessment need to be clearly defined both from a physical standpoint as well as from a documentation standpoint. The physical boundaries should include only those pertinent to the ITS diversion objectives. The documentation boundaries should include only those regulations, orders, permits, etc. that are specific to the diversion and should not include those that apply plant wide.

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In addition, the findings of the DOE program readiness assessment, conducted in August 1992, that pertain to the ITS diversion must be addressed Specifically these items are as follows RF-92-02-01-02, 03, 04, 05, 06, 07, 08, 09, 17, 24, 26, 30, 35, 36, and 37 We realize that a majority of these items have been worked by EG&G, however, close out documentation will need to be available

Be advised that DOE will require a review of the project's readiness by a DOE team composed of personnel from DOE/RFO, DOE/HQ and DOE support contractors. The exact composition of this team is yet to be determined. It is anticipated that this team will be on site for a period of approximately two days, currently scheduled for the 25th and 26th of February on the ITS Diversion Schedule, to conduct the assessment. We would like to compile a readiness assessment package containing documentation, commensurate with the scope of the assessment, which will be sent out to the review team prior to their convening here on-site. The composition of the assessment package will be mutually agreed to by DOE/RFO and EG&G. The definition and compilation of the review criteria and package needs to be added to the ITS Diversion Schedule.

This readiness assessment could serve as a model for all future environmental restoration projects of the same hazard classification. We, therefore, need to assure that it is properly scoped and has the concurrence not only of EG&G and DOE/RFO, but of DOE Headquarters as well. EG&G is requested to provide a draft outline on the conduct of the readiness assessment. This outline will contain EG&G's recommended approach to the assessment and list the appropriate criteria and documentation that it feels the readiness assessment should cover. The DOE/RFO and EG&G program staffs shall then mutually agree on all aspects of the assessment. There should be only one set of readiness requirements that satisfy all program offices, i.e., DOE/HQ, DOE/RFO and EG&G

If you have any questions or require further information please contact Frazer Lockhart on extension 7846

Assistant Manager

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